

1 answer.

2 A. Mr. Laurino.

3 Q. All right. Getting back to the conversation
4 that you had with Mr. Bayad. You told us that you went
5 to your office.

6 Did you -- did you shut the door when you
7 went to speak to him? Mr. Navas patched you through to
8 Mr. Bayad, do you remember that?

9 A. Yes.

10 Q. Let's back up.

11 Do you remember that you told me that you
12 spoke to Mr. Bayad personally the morning of his
13 interview?

14 A. Yes.

15 Q. Okay. Do you remember that you told me that
16 Mr. Navas effectively patched him through to you?

17 A. I asked Mr. Navas to --

18 Q. Transfer?

19 A. -- transfer the call into my office.

20 Q. All right. And did he, in fact, do that?

21 A. Yes.

22 Q. And did you have the conversation that we're
23 going to talk about in a moment with Mr. Bayad from
24 your office?

25 A. Yes, I did.

1 recollection was, "Anthony, please listen to me very
2 carefully. I am giving you a work directive that I
3 want you here at this office as quickly as you can
4 possibly be here. Should you decide not to come, I am
5 going to view that as insubordination and you will
6 suffer the consequences thereof."

7 He then said, "Are you going to fire me?"

8 I then said, "I didn't say that. I just
9 need for you to be here as quickly as you possibly can."

10 Q. Was that the sum of the conversation?

11 A. Yes.

12 Q. Okay. Were those the exact words that you
13 used?

14 A. Exact words.

15 Q. Okay. You have admitted, have you not, in
16 paragraph 33 of your Answer, making the statement that
17 you, "didn't care if Mr. Bayad had to take a flying
18 carpet to Largo," and -- and language similar to that?

19 A. Yes, I admit that. *Calling Mr. Bayad*

20 Q. All right.

21 A. I did not make that statement to Mr. Bayad.

22 Q. Okay. To whom did you make that statement?

23 A. I made that statement to Mr. Navas when he
24 told me something to the effect, "How do you expect him
25 to get here?"

Flying carpet

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1 Q. Was your office door open or closed?

2 A. It was closed.

3 Q. Was anyone else in the room during that
4 conversation?

5 A. No.

6 Q. Were you on the speaker phone?

7 A. No.

8 Q. Okay. Tell me what you -- is that the one
9 and only conversation that you had with Mr. Bayad
10 before he came to Largo that same day?

11 A. Yes, it was.

12 Q. Tell me what was said in that conversation.

13 A. The conversation essentially went, "Anthony,
14 I understand that you are not planning on coming to
15 Largo."

16 And he said "That's correct."

17 And I said, "Did you not understand that you
18 were to be here at 1:00?"

19 He said, "Yes, but I'm not going to come."

20 I asked him, "Why not?"

21 He said -- one time he said he had customers
22 that he was working and then another time he said,
23 "Unless you tell me the specific reason why you want
24 me to be there, I'm not coming."

25 And my response to him, to the best of my

1 Q. Okay. And in your conversation there, then,
2 with Mr. Bayad, you did not actually use that
3 language?

4 A. No.

5 Q. You do not deny, however, making a reference
6 specifically contrary to the language that you used in
7 the conversation with Mr. Bayad, "quickly," but that
8 he thought, if necessary, take a flying carpet? You do
9 not deny having said that?

10 A. I did not say it to Anthony Bayad, but I did
11 say it to Amado Navas.

12 Q. Where did you make that statement to
13 Mr. Navas?

14 A. Out on -- right adjacent to his office.

15 Q. All right. Did Mr. Navas, at that time, have
16 an enclosed office such as you did?

17 A. No, he did not.

18 Q. All right. Was it a work area which was
19 open?

20 A. Yes.

21 Q. Cubicle?

22 A. Yes.

23 Q. All right. With others in the -- in the same
24 area?

25 A. I believe so.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

ANTHONY BAYAD.

Plaintiff.

Case No.: 97-6671-C.V.-ROETTGER
Magistrate Seltzer

vs.

LUCENT TECHNOLOGIES, INC.,
LEWIS KASLOW, NICK REED,
RONALD LAGRINO, ANTHONY SAVASTANO,
AND JOAN JACKIE.

Defendant.

DEPOSITION OF: LEWIS KASLOW
 TAKEN: Pursuant to Notice by
 Counsel for Plaintiff
 PLACE: Marriott Hotel
 Tampa International Airport
 Monroe Room
 Tampa, Florida
 DATE: June 22, 1998
 TIME: Began: 3:01 p.m.
 Ended: 6:39 p.m.
 REPORTED BY: KEVIN P. NINCH, RPR, RMR
 Registered Merit Reporter
 Notary Public - State of Florida
 at Large

APPEARANCES:

DAVID J. SALES, ESQUIRE
 Beardy, Deeney, Scarpa,
 Barnhart & Shipley, P.A.
 2139 Palm Beach Lakes Boulevard
 West Palm Beach, Florida 33462

-and-

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 Coral Gables, Florida 33134
 Attorney for Defendants.

ALSO PRESENT: ANTHONY SAVASTANO

: * * * *

Page

Examination

By Mr. Sales

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STIPULATION

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DEFENDANT SIGNATURE PAGE

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CERTIFICATE OF CATH

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CERTIFICATE OF REPORTER

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E X H I B I T S

Plaintiff's Exhibit 1 (Marked After Deposition)
 Plaintiff's Exhibit 2 (Marked Prior to Deposition)
 Plaintiff's Exhibit 3 (Marked After Deposition)
 Plaintiff's Exhibit 3 (Marked After Deposition)
 Plaintiff's Exhibit 17 (Marked Prior to Deposition)
 Plaintiff's Exhibit 29 (Marked Prior to Deposition)
 Plaintiff's Exhibit 36 (Marked Prior to Deposition)
 Plaintiff's Exhibit 32 (Marked Prior to Deposition)
 Plaintiff's Exhibit 41 (Marked Prior to Deposition)
 Plaintiff's Exhibit 26 (Marked Prior to Deposition)

(All Exhibits Attached)

EXHIBITS!

Filed 10/31/2005 Page 2 of 2

The Deponent herein,

LEWIS KASLOW.

being first duly sworn to tell the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

EXAMINATION

7 BY MR. SALES:

8 Q. What is your name, sir?

9 A. My name is Lewis Kaslow.

10 Q. And your date of birth?

11 A. Date of birth is 11-12-1948.

12 Q. Where do you reside?

13 A. I reside in Palm Harbor, Florida, and the address is 4498 Fallbrook Boulevard, Palm Harbor, Florida. The ZIP code is 34685.

14 Q. I was told by someone else that the Largo facility for Lucent has moved. Is that correct?

15 A. That is correct.

16 Q. Where are you all now?

17 A. We are at the northern part of St. Petersburg.

18 Q. What's the address there?

19 A. 11399 16th Court North.

20 MR. SAVASTANO: St. Petersburg, Florida, 33711.

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1 Q. And when did that occur?

2 A. The move occurred in a four phase move. We 3 actually started moving over there in late January and 4 it finished up in February.

5 Q. So it's up and running now?

6 A. It is up and running.

7 Q. Tell me what that facility is like.

8 A. That facility is very analogous to the Largo 9 Customer Care Center. We just moved it from the old 10 Paradyne facility over to a new facility. It is a 11 three story, 100,000 square foot facility where we 12 supply network management to data networking customers 13 as well as installation and support.

14 Q. And what is your title there?

15 A. My title there is General Manager of the 16 Tampa Bay NetCare Services Center.

17 Q. So that hasn't changed in the last 12 to 17 18 months?

19 A. No, it has not.

20 Q. Is there anybody above you at the office?

21 A. At the office?

22 Q. Resident in that facility.

23 A. At the time this all occurred, no.

24 Q. How about now?

25 A. Yes.